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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:	Chapter 13
Gary M. Repack, Jr., Melissa W. Repack,	Case No. 22-13754-CMG
	Hearing Date: December 21, 2022 at 9:00 a.m.
Debtors.	Judge: Christine M. Gravelle

**NOTICE OF MOTION TO VACATE AUTOMATIC STAY
ORAL ARGUMENT WAIVED**

TO: Gary M. Repack, Jr.
12 Glacier Drive
Howell, NJ 07731
Debtor

Melissa W. Repack
12 Glacier Drive
Howell, NJ 07731
Joint Debtor

Warren Brumel
Law Office of Warren Brumel
65 Main Street
PO Box 181
Keyport, NJ 07735
Attorney for Debtor

Albert Russo
CN 4853
Trenton, NJ 08650-4853

Chapter 13 Trustee

Office of the United States Trustee
One Newark Center
1085 Raymond Boulevard
Suite 2100
Newark, NJ 07102
United States Trustee

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541
Notice Party

AIS Portfolio Services, LP
Attn: Nuvel Credit Company Department
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118
Notice Party

AIS Portfolio Services, LP
Attn: Ally Financial Department
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118
Notice Party

SIR/MADAM:

PLEASE TAKE NOTICE that on December 21, 2022 at 9:00 a.m., or as soon thereafter as counsel can be heard, the undersigned attorneys for NewRez LLC d/b/a Shellpoint Mortgage Servicing as the Servicer for DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR SOUNDVIEW HOME LOAN TRUST 2007-WMC1, ASSET BACKED CERTIFICATES, SERIES 2007-WMC1 ("Movant"), will move before the United States Bankruptcy Court, Honorable Christine M. Gravelle, U.S.B.J., Clarkson S. Fisher U.S. Courthouse, 402 East State St., Courtroom 3, Trenton, New Jersey 08608, for an Order Vacating the Automatic Stay under 11 U.S.C. § 362(d) with respect to real property owned by Gary M. Repack, Jr. and Melissa W. Repack (together, "Debtors") at 12 Glacier Drive, Howell, New Jersey 07731 (the "Property"), to allow Movant to pursue a mortgage foreclosure and/or other remedy under state law.

This motion is based on the Debtors' failure to make regular monthly mortgage payments outside the Chapter 13 Plan. Movant asserts that the facts and law it relies upon in making this

motion are neither complicated nor unique, and therefore no brief or legal memorandum is necessary pursuant to D.N.J. LBR 9013-1.

Dated: November 18, 2022

McCalla Raymer Leibert Pierce, LLC
Attorneys for Movant

By:

/s/ **Phillip Raymond**

Phillip Raymond

Debtor or Debtor's Counsel is encouraged to contact NewRez LLC d/b/a Shellpoint Mortgage Servicing to discuss potential loss mitigation options, if the debtor(s) is experiencing hardship resulting from COVID-19. Please call 866-825-2174 for assistance Monday-Friday 9am to 8pm EST.